

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Rusbael Sanchez-Olivas

Case No. 21-MJ-579

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*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2017 to September 2, 2018 in the county of Philadelphia in the Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

21 USC Sec. 846 and 841 (b)(1)(A)

Conspiracy to distribute and possess with intent to distribute 400 grams or more of fentanyl.

This criminal complaint is based on these facts:

From on or about May 2017 to on or about September 2, 2018, in the Eastern District of Pennsylvania, and elsewhere, defendant Rusbael Sanchez-Olivas conspired to distribute and possess with intent to distribute, 400 grams or more, that is, approximately 5 kilograms, of fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. Sections 846 and 841(b)(1)(A).

☒ Continued on the attached sheet.

s/DAVID B. CLEE

*Complainant's signature*

David B. Clee, Task Force Officer, DEA

*Printed name and title*

Sworn to before me and signed in my presence.

Date: March 26, 2021

s/RICHARD A. LLORET

*Judge's signature*City and state: Philadelphia, PA

Hon. Richard A. Lloret, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, David B. Clee, Task Force Officer (TFO), Drug Enforcement administration (“DEA”), Philadelphia, Pennsylvania, being duly sworn, state:

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code, in that I am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I have been a Task Force Officer with the DEA since July of 2011 and have been assigned to the DEA Philadelphia Field Division Task Force Group 32, a Task Force of Law Enforcement Officers working under a High Intensity Drug Trafficking Area (HIDTA) and consisting of DEA agents and members of the Philadelphia Police Department, Bensalem Township Police Department, and Commonwealth of Pennsylvania Office of Attorney General. Prior to my employment with the DEA, I was a Narcotics Investigator employed by the Bensalem Township Police Department, Bucks County, Pennsylvania for approximately ten years. I have specialized training and experience in narcotics smuggling and distribution investigations, including, but not limited to, the means and methods used by traffickers to import and distribute narcotics, interdiction, smuggling methods, and the concealment and laundering of proceeds from illicit drug trafficking activities. I have participated in hundreds of narcotics investigations, debriefed or participated in debriefings of hundreds of defendants, informants, and witnesses who had personal knowledge regarding major narcotics trafficking organizations, and have participated in all aspects of drug investigations. I, David B Clee, being duly sworn, depose and say:

2. Pursuant to an ongoing drug investigation, which began in May 2017,

investigators identified Manuel LOPEZ-Avitia as the head of a large-scale Mexican drug trafficking organization, operating throughout the U.S., and involved in the distribution of multi-kilogram quantities of methamphetamine, cocaine, heroin, and fentanyl. LOPEZ-Avitia was found to have multiple criminal associates and drug customers in Pennsylvania, including maintaining a drug “stash” house at 316 Calvert Street in Whitehall, Pennsylvania. The house was operated by members of his drug organization, LOPEZ-Avitia was observed at the residence on numerous occasions, and frequently stayed there for extended periods of time. Through the analysis of telephone toll records of numerous cellular telephones used by LOPEZ-Avitia, and surveillance of LOPEZ-Avitia, and the “stash” house location, investigators identified multiple criminal associates and drug customers. These criminal associates included the identification of Mexican brothers Ebert CABRERA and Rudy CABRERA. Ebert CABRERA was determined to reside in Allentown, Pennsylvania, and Rudy CABRERA was determined to reside in New York and Michigan; and Dominican brothers Jose GENAO-Caba, Franklin GENAO-Caba and Francisco-GENAO-Caba from Philadelphia, PA and Camden, NJ. The associates also included Mexican Jaiden PADILLA and Colombian Dabinsson NINO-Meyer who maintained the Pennsylvania stash house, distributed drugs, and collected drug proceeds.

3. On June 9, 2017, discarded trash was collected from 316 Calvert Street, Whitehall, PA and receipts for the purchase and activation of multiple pre-paid mobile phones, in an alias name used by Jaiden PADILLA, were found along with other telephone numbers, names, and addresses from Texas, and a scrap of paper with the name of Maria Chavez and a Bank of America account number. On June 15, 2017, a concealed camera was installed on the residence at 316 Calvert Street, Whitehall, PA.

4. On July 3, 2017, two Mexican males (subsequently identified as Manuel LOPEZ-Avitia and Alberto Reyes-Castro), driving a gray 2016 Chevrolet Suburban, with Pennsylvania registration KGH9272, registered to Franklin GENAO-Caba at 4246 J Street, Philadelphia, PA, were observed visiting Franklin GENAO-Caba's residence in Philadelphia and then traveling to 316 Calvert Street, Whitehall, PA and meeting with Jaiden PADILLA who had arrived in a U-Haul rental van. PADILLA's SUV from Illinois was again observed parked in the street and it appeared to have been stored in the garage while he was away. License plate reader (LPR) information and phone toll location information showed that PADILLA and the gray Chevrolet Suburban had been in the Atlanta, GA area in late June 2016, and records determined that the U-Haul van PADILLA was observed with at the Calvert Street residence was rented by him in Snellville, Georgia on June 30, 2017. Also, after PADILLA and the others were observed returning to Calvert Street from Georgia, the pre-paid cellular phones found in the initial trash search went inactive. Tolls from the telephones showed contact with Mexico, California, Texas, Illinois, Pennsylvania, New Jersey, New York, and Georgia.

5. On July 9, 2017, discarded trash was again collected from the Calvert Street house and found to contain a bank statement in the name of NINO-Meyer, addressed to the same Whitehall address, which showed NINO-Meyer was in Georgia in May 2017, as well as in Allentown, PA and New York.

6. On July 11, 2017, Jaiden PADILLA, LOPEZ-Avitia, and another Mexican male departed from 316 Calvert Street, Whitehall, PA in the 2016 Chevrolet Suburban, and on July 13, 2017 agents began receiving court authorized location information for PADILLA's cellular telephone (773) 301-6136. At that time, PADILLA and LOPEZ-Avitia were located in

San Antonio, Texas. Physical and electronic surveillance observed the Chevrolet Suburban at a San Antonio motel, and the location information for PADILLA's telephone showed repeated visits to several residences in San Antonio including a residence occupied by Rusbael SANCHEZ-Olivas at 4910 Native Dr., San Antonio, Texas. Subsequent toll records showed frequent contact between cellular telephone (210) 560-7818 used by SANCHEZ-Olivas and the known telephones of LOPEZ-Avitia, NINO-Meyer, and PADILLA.

7. On July 15, 2017, PADILLA and LOPEZ-Avitia departed San Antonio, Texas in the Chevrolet Suburban and drove back to Pennsylvania where, on July 17, 2017, agents arranged for the Suburban to be stopped by a Pennsylvania State Police Trooper. PADILLA and LOPEZ-Avitia were found to be accompanied by Mexican national Rafael Alberto Reyes-Castro who stated he was a police officer in Mexico. During a consent search of the Chevrolet Suburban, notes on hotel stationery were found regarding acquiring a house in Lawrenceville, GA with a garage; and a pre-paid cellular phone, with a Georgia area code, was found concealed in a natural void in the dashboard of the Suburban. Tolls from the hidden phone showed extensive contact with numbers in Mexico and Georgia, and the phone was believed to belong to LOPEZ-Avitia. This initial identification of LOPEZ-Avitia, who was in possession of a Mexican passport, resulted in his identification (through law enforcement records) as the head of a large Mexican methamphetamine distribution organization based in San Antonio, Texas and distributing from Mexico to Texas, Illinois, Florida, and California. He was also documented as using vehicles with hidden compartments, concealing drugs in the spare tires of rental vehicles, and trafficking in firearms. Additional records showed that in January 2016, a courier for LOPEZ-Avitia, who departed from San Antonio, was stopped while driving in Louisiana with 5

pounds of methamphetamine destined for delivery in Plant City, Florida.

8. Information received from the methamphetamine courier identified LOPEZ-Avitia's girlfriend as Maria Chavez who resided with him in San Antonio, TX and who was the registered owner of a tan/gold colored Chrysler Sebring Convertible, with California license plates, equipped with a concealed compartment for transporting drugs. Maria Chavez was also found to have been arrested in 2015 in Chicago, IL while accompanying a male in possession of 5 kilos of cocaine and \$166,000. The Chrysler Sebring convertible was later found to have been re-registered multiple times in San Antonio (after the methamphetamine seizure), and was most recently registered in Chicago, Illinois to Dabinsson NINO-Meyer at an address previously used by Rudy Cabrera. In March 2018, the Chrysler Sebring Convertible was observed in the garage of, and parked in front of 316 Calvert Street, Whitehall, PA; and in June 2018, NINO-Meyer loaded the Sebring with 15 kilos of drugs and approximately \$250,000 he stole from LOPEZ-Avitia and fled from the Whitehall, PA stash house with the vehicle.

9. On September 21, 2017, location information for Jaiden PADILLA's cellular telephone (773) 301-6136 showed that he drove non-stop from Pennsylvania to San Antonio, Texas where he briefly stopped outside of the city before immediately heading back eastbound. Due to the time of night, and the short duration of his stop in a rural area, surveillance was unable to observe any activity. On his way back to Pennsylvania, PADILLA was stopped by law enforcement in Mississippi where he told the officer he had transported a load of alcohol to his "boss" for a wedding or party in Texas. Phone tolls from PADILLA's trip to San Antonio revealed he communicated with a telephone used by Manuel LOPEZ-Avitia and a telephone number determined to be used by inmates in the federal prison facility CI Great Plains located

in Hinton, Oklahoma.

- a) Audio from the recorded jail calls was obtained and an officer fluent in Spanish reviewed the 19 calls, which occurred between 08-12-2017 and 10-11-2017, and determined that Jaiden PADILLA was speaking with his older brother Joaquin Padilla who was in federal prison serving a sentence for violating supervision regarding a 375 pound marijuana drug conviction for which he received a 41 month sentence, and re-entry after deportation. He was also previously identified in other DEA investigations as being involved in cocaine distribution in Indiana and Chicago, Illinois. The content of the calls confirmed Joaquin Padilla has a previous drug relationship with LOPEZ-Avitia a/k/a "Compa," and that Jaiden PADILLA has been working for LOPEZ-Avitia by moving money and drugs. During one of the conversations in August 2017, he asked Jaiden PADILLA about when he (Jaiden PADILLA) went on "vacation with those 7 people" (referring to 7 kilograms) and where they went. Jaiden PADILLA responded that they went from Georgia to Pennsylvania. Joaquin PADILLA also asked numerous questions about them having any "work" (drugs) and Jaiden PADILLA admitted to taking money to New York for LOPEZ-Avitia, described items being 28 and a half (\$28,500), and also used code words for cocaine, heroin, and marijuana. During one of the recorded calls on October 10, 2017, another inmate, using Joaquin PADILLA's jail phone account and identified as LOPEZ-Avitia's brother-in-law, spoke to Jaiden PADILLA and then to Manuel LOPEZ-Avitia a/k/a "Compa," who was present with PADILLA.

b) Joaquin PADILLA was released on December 6, 2017, and again deported to Mexico. During the calls he told Jaiden PADILLA he would return to the U.S. and they could work together supplying (with drugs) people he had met in prison. A review of prison records showed that money was placed in Joaquin Padilla's jail account by Jaiden PADILLA and by Rusbael SANCHEZ-Olivas.

10. During the period of October 12, 2017 to October 16, 2017, location information for Jaiden PADILLA's cellular telephone showed he departed from Pennsylvania in his identified vehicle and traveled to Chicago, Illinois.

11. On October 16, 2017, at approximately 2:30 a.m., after the front porch light of 316 Calvert Street, Whitehall, turned on and off numerous times, a taxi cab SUV arrived and a subject, believed to be Rusbael SANCHEZ-Olivas from San Antonio, Texas, exited the rear seat of the SUV and a male (believed to be Manuel LOPEZ-Avitia) exited the residence. Both males then entered 316 Calvert Street together.

12. On October 17, 2017, PADILLA drove from Chicago to Nashville, Tennessee and returned to Chicago the following day where surveillance observed him at an apartment complex where he paid cash to rent an apartment and then immediately drove back to Nashville. DEA agents in Nashville conducted surveillance and observed PADILLA meeting with 2 Hispanic males at a restaurant, and visiting a car lot and a phone store. He returned to Chicago with an unidentified male and stayed briefly in the newly rented apartment before going to the airport (presumably to drop off the unidentified male). PADILLA's telephone contacts while in Tennessee related to a DEA Nashville heroin investigation in which investigators had received information that subjects in their case were recently seeking to find a new heroin source.



a) In a subsequent recorded jail call, Jaiden PADILLA told his incarcerated brother Joaquin Padilla that he had picked up money in Tennessee and believed he was followed (by police) while he was there and while returning to Chicago.

13. After PADILLA departed from Nashville, a newly activated Tennessee cellular telephone began communicating with LOPEZ-Avitia and others. Also, a Texas telephone used by Angel Montemayor communicated with LOPEZ-Avitia and toll records showed Montemayor was in Nashville after PADILLA departed, and was in contact with numerous Tennessee numbers before flying from Nashville to Allentown, PA on October 20, 2017 and being observed entering 316 Calvert Street, Whitehall, PA. Montemayor was determined, through public records, to use the same address in Rio Grande City, Texas used by Nhilze Campos (a suspected drug shipment coordinator and wife of federal inmate Rogelio Campos) who was in regular contact with LOPEZ-Avitia on numerous cellular telephones he was identified as using during this investigation.

14. On October 20, 2017, discarded trash was collected from 316 Calvert Street Whitehall, PA which contained numerous used and unused dryer sheets, knotted shopping bags ripped open, torn pieces of receipts of money wire transfers, burnt religious candles, and an airline ticket boarding pass in the name Rusbael SANCHEZ-Olivas documenting his air travel from San Antonio, Texas to Philadelphia, PA on October 15, 2017.

15. On November 2, 2017, discarded trash was collected from 316 Calvert Street Whitehall, PA which contained an August 4, 2017 web order receipt from the Buffalo Wild Wings Restaurant at 9701 Roosevelt Blvd., Philadelphia, PA with the name "Davinson Meyer" (Dabinsson NINO-Meyer) and contact telephone number (267) 423-8566. An analysis of toll

records for (267) 423-8566, a T-Mobile cellular telephone activated on May 31, 2017 with no subscriber information, shows contacts with multiple telephones used by Manuel LOPEZ-Avitia; telephone used by Franklin GENAO-Caba and Jose GENAO-Caba; and cellular telephones (210) 560-7818 and (210) 993-8321 used by and associated with Rusbael SANCHEZ-Olivas.

16. Between May 30, 2018 and August 1, 2018, DEA Philadelphia conducted a federal court-authorized wire intercept of cellular telephone (267) 671-3849 (Target Telephone #1), used by Jose GENAO-Caba. During the interception, Jose GENAO-Caba and Franklin GENAO-Caba discussed their drug activities and their drug relationship with Dabinsson NINO-Meyer and Manuel LOPEZ-Avitia, and GENAO-Caba had multiple drug-related conversations with NINO-Meyer. In a June 13, 2018 intercept, NINO-Meyer told Jose GENAO-Caba that he (NINO-Meyer) had stolen 15 kilos and \$250,000 belonging to LOPEZ-Avitia and had fled the organization's stash house in Whitehall, Pennsylvania. The following day, on June 14, 2018, the intercept captured Jose GENAO-Caba arranging to tow the drug organization's silver Nissan Altima, with two (2) kilograms in a hidden compartment in the dashboard, to Detroit, Michigan, at the direction of LOPEZ-Avitia. Surveillance followed and stopped GENAO-Caba, took custody of the vehicle, and allowed GENAO-Caba to leave. Officers subsequently searched the Nissan Altima and seized two (2) kilograms of fentanyl from the dashboard compartment.

17. On June 16, 2018, Manuel LOPEZ-Avitia returned to the Calvert Street stash house residence in Whitehall, Pennsylvania (driving a 2018 white Honda CRV registered in Pennsylvania in his name) where he was joined by Allentown, Pennsylvania resident Ebert CABRERA and others. The wire intercept confirmed that LOPEZ-Avitia was in Pennsylvania in

an attempt to locate NINO-Meyer, who had stolen drugs and money from him, and to investigate the seizure of the two kilograms of fentanyl seized from Jose GENAO-Caba while he was transporting it to Detroit, Michigan for LOPEZ-Avitia.

18. On June 22, 2018, discarded trash collected from 316 Calvert Street, Whitehall, Pennsylvania contained a Wells Fargo Bank statement for Manuel LOPEZ-Avitia. Records obtained for the account show it was opened on December 11, 2017, in Allentown, Pennsylvania. Each monthly statement was mailed to the original account address of 316 Calvert Street, Whitehall, Pennsylvania, until the June 2018 statement when the mailing address was changed to 812 49<sup>th</sup> Street, San Diego, California (when LOPEZ-Avitia vacated the Whitehall, Pennsylvania residence). In August 2018, a related account was opened by LOPEZ-Avitia in the business name Rayo M. Trucking, LLC with a mailing address of 340 Dunmire Street, Frederick, Colorado (which is the same address used by LOPEZ-Avitia when he obtained a Colorado driver's license in August 2018). Activity in these accounts included numerous cash deposits as well as deposits in the form of checks and money orders, which have occurred at ATMs and branch offices. LOPEZ-Avitia made frequent cash withdrawals, often immediately after deposits occurred, and used the account to purchase food, airline tickets, other goods and services, and to rent cars and hotel rooms. The accounts also reflect frequent balance inquiries. The deposits and withdrawals occurred throughout the United States in cities where LOPEZ-Avitia and his criminal associates have been identified as operating and/or conducting their drug business. Additionally, these deposits occurred in cities/states where individuals with whom LOPEZ-Avitia had telephone contact were located. The following activity was identified on LOPEZ-Avitia's Wells Fargo account:

- a) On December 11, 2017, \$2,000 was deposited into LOPEZ-Avitia's account in Nashville, Tennessee. (LOPEZ-Avitia associate Jaiden Padilla was documented as traveling to Nashville, Tennessee in October 2017 and establishing a new drug customer(s) for the LOPEZ-Avitia organization. Following that visit, several of the telephones used by LOPEZ-Avitia had contact with Nashville, Tennessee telephone numbers.
- b) Between December 15, 2017 and January 12, 2018, \$16,000 was deposited into LOPEZ-Avitia's account in the form of checks from "Cavevi Naturals," which is a company in Edinburg, Texas owned and operated by Maria MONTEMAYOR-Cantu, who was identified on October 5, 2017 when she was observed at a Bensalem, Pennsylvania hotel with Jaiden Padilla and claimed to be looking for a warehouse in Pennsylvania to bring her produce. An additional \$4,000, from an unidentified source was deposited to LOPEZ-Avitia's account in Edinburg, Texas on December 28, 2017.
- c) In February 2018, multiple cash deposits were made to LOPEZ-Avitia's account in Allentown, Pennsylvania. Additionally, on February 16, 2018, \$2,500 was deposited to his account in Camden, New Jersey, and on the same day LOPEZ-Avitia signed a check for \$2,000 payable to Dabinsson NINO-Meyer.
- d) On February 27, 2018, \$2,000 was deposited into LOPEZ-Avitia's account in Nashville, Tennessee.
- e) On June 8, 2018, a \$5,500 check was deposited to LOPEZ-Avitia's account which was from a bank in Dalton, Georgia, and had a remitter listing name of Rusbael SANCHEZ-Olivas.

19. On June 24, 2018, while LOPEZ-Avitia was at the Whitehall, PA stash residence, the location was visited by Ebert CABRERA and Maryland resident Luis LLANOS who arrived in LLANOS' gray Honda 4-door with Maryland license plates.

20. On July 5, 2018, after vacating the Whitehall, Pennsylvania stash house (and not renewing the rental contract), Manuel LOPEZ-Avitia left Pennsylvania in his Honda CRV and drove to Chicago, Illinois. He was then confirmed to be in telephone contact with several Illinois telephones directly related to a 30-kilogram heroin seizure that occurred in Aurora, Illinois, on July 2, 2018. LOPEZ-Avitia then traveled to Colorado where, in August 2018, he obtained a driver's license and began using multiple cellular telephones with Colorado area codes.

21. In October 2018, a Cooperating Defendant (CD1) identified Manuel LOPEZ-Avitia a/k/a "Compa" as the head of a Mexican drug organization, assisted by multiple individuals, and involved in the receipt and distribution of kilogram quantities of heroin, fentanyl, and cocaine to numerous customers in Philadelphia and Allentown, Pennsylvania and elsewhere. CD1 also identified Rudy CABRERA as a criminal associate of LOPEZ-Avitia who received multi-kilogram shipments of fentanyl from LOPEZ-Avitia. CD1 further identified Ebert CABRERA a/k/a "Bola" as another member of the LOPEZ-Avitia drug organization who lived at 807 E. Turner Street in Allentown, Pennsylvania. CD1 advised that the Nissan Altima with the hidden compartment belonged to LOPEZ-Avitia, along with a second vehicle (a black Ford Fusion) with a large hidden compartment behind the rear seat that held 15 kilogram packages. Both vehicles were used by members of the organization to deliver drugs and pick up money. CD1 admitted to picking up multiple kilogram shipments of fentanyl from a truck driver in northern New Jersey at the direction of LOPEZ-Avitia, and also accompanying LOPEZ-Avitia

and NINO-Meyer to Atlanta, Georgia where they picked up shipments of produce (tomatoes) which had drugs concealed in the produce crates. The crates were driven to Allentown, Pennsylvania in U-Haul rental vans and trucks, where the drugs were removed in a warehouse location. CD1 further explained that the organization frequently transported drug proceeds to New York City, and that the organization residence in Whitehall, Pennsylvania was a location used to store and distribute drugs and drug proceeds, and load the vehicles equipped with hidden compartments. CD1 admitted to delivering drugs and money to the organization residence in Whitehall, Pennsylvania, making trips to Detroit for the organization, and also confirmed that NINO-Meyer had stolen 5 kilograms of heroin, 5 kilograms of fentanyl, and 5 kilograms of cocaine from LOPEZ-Avitia, along with currency. CD1 was shown known photographs of Manuel LOPEZ-Avitia, Rudy CABRERA, and Ebert CABRERA and positively identified them as the individuals CD1 had described.

22. On March 2, 2019, officer seized 2 kilograms of fentanyl from a Bensalem, PA apartment and arrested 3 individuals who were processing the drugs in the apartment. The drugs were determined to be supplied by Ebert CABRERA and Rudy CABRERA, and had been arranged by LOPEZ-Avitia. Investigators also learned that the fentanyl had been obtained in Ohio, at the direction of LOPEZ-Avitia, and had been transported to Bensalem, PA by Luis LLANOS.

23. In late 2019, LOPEZ-Avitia and other members of his drug organization were charged and arrested pursuant to this investigation. Thereafter, multiple defendants began cooperating. Two cooperating defendants (CD2 and CD3) advised that in late August 2018, at the direction of LOPEZ-Avitia, Ebert CABRERA and Luis LLANOS drove from Pennsylvania

to San Antonio, Texas. During the trip, their vehicle broke down in Louisiana, and LLANOS rented a vehicle there which they used to continue their trip to Texas. On September 1, 2018, CABRERA and LLANOS, also at the direction of and arranged by LOPEZ-Avitia, met with a Mexican male drug associate of LOPEZ-Avitia (identified as Rusbael SANCHEZ-Olivas) in a trailer home and received 5 kilograms of fentanyl from him. LLANOS then transported the drugs, at the direction of LOPEZ-Avitia, to Chicago, IL concealed in the spare tire of a pick-up truck LLANOS rented in San Antonio, TX. CD2 also advised that, following the delivery, LLANOS was stopped by police in Pennsylvania while driving the rental truck back to his home in Maryland. CD2 and CD3 were shown a photograph of Rusbael SANCHEZ-Olivas and positively identified him as the person who supplied the 5 kilograms of fentanyl.

- a) Rental car records were found confirming that Luis LLANOS rented a vehicle on August 31, 2018 in Lafayette, Louisiana.
- b) Rental car records were found confirming that Luis LLANOS rented a Ford pick-up truck on September 1, 2018 in San Antonio, TX, which was also capture on license plate readers traveling northbound just north of Dallas Texas on September 2, 2018 (along the most common route between San Antonio, TX and Chicago, IL).
- c) Police records were found confirming that the same rental truck, being driven by LLANOS, was stopped by Pennsylvania police on September 3, 2018 near the Maryland border.

24. CD2 and CD3 also advised that after LLANOS departed Texas for Illinois, CABRERA drove with SANCHEZ-Olivas to Denver, Colorado where they met with LOPEZ-

Avitia. CD2 and CD3 further stated that, at the time of this delivery, SANCHEZ-Olivas was engaged in some type of dispute with LOPEZ-Avitia about an unidentified house.

a) Property records reveal that SANCHEZ-Olivas owns two (2) different trailer homes in and around San Antonio, TX, one of which matches the description given by CD2 and CD3 of the location where the drug delivery occurred. SANCHEZ-Olivas also owned the residence at 4910 Native Dr., San Antonio, TX until March 2019, when ownership of the property was transferred into the name Manuel LOPEZ (believed to be Manuel LOPEZ-Avitia). The transaction was reported as a warranty deed re-sale with a cash purchase payment.

25. Toll records for Pennsylvania cellular telephone (267) 206-1363 (known to be used by Ebert CABRERA during the San Antonio trip) show 12 calls with Colorado cellular telephone (970) 404-2596 between August 25, 2018 and September 3, 2018; and 12 calls with Colorado cellular telephone (970) 534-4377 between September 2, 2018 and September 6, 2018. Both Colorado cellular telephones, based on toll analysis, are believed to have been be used by Manuel LOPEZ-Avitia.

a) Toll records for cellular telephone (210) 560-7818 (known to be used by Rusbael SANCHEZ-Olivas) show 2 calls with Colorado cellular telephone (970) 534-4377 (used by LOPEZ-Avitia) on September 4, 2018.



26. Given the facts and circumstances described above, your affiant believes that there is sufficient probable cause to believe that from in or about May 2017 to on or about September 2, 2018, Rusbael SANCHEZ-Olivas conspired to distribute and possess with intent to distribute 400 grams or more, that is, approximately 5 kilograms, of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 846.

s/DAVID B. CLEE  
David B. Clee  
Task Force Officer  
Drug Enforcement Administration

Sworn and subscribed before me this 26th day  
of March, 2021.

s/RICHARD A. LLORET  
HON. RICHARD A. LLORET  
United States Magistrate Judge